

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

AFFIDAVIT

I, James D. Holdman Jr., being first duly sworn, do hereby depose and state that:

1. This affiant is a Special Agent (SA) with United States Immigration and Customs Enforcement (ICE) Office of Homeland Security Investigations (HSI) in Springfield, Missouri. This affiant has been employed with ICE/HSI since June of 2003. This affiant has been employed in the field of law enforcement since January 1989, including duties as a deputy sheriff in Washington County, Missouri, and a criminal investigator for the State of Missouri.
2. As part of this affiant's duties with ICE/HSI, this affiant investigates criminal violations relating to child exploitation, child pornography, human trafficking, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2422(a) and (b), 2252(a), and 2252A. This affiant has received training in the areas of child pornography, child exploitation, and human/sex trafficking.
3. This affiant has conducted operations relating to exploitation of children and adults in Costa Rica, the border area of the United States and Mexico, and the Philippines. This affiant has instructed classes on sexual exploitation of children, interviewing, evidence collection, case studies, and undercover operations to law enforcement agencies within the United States, including five national conferences, as well as to law enforcement location in the following foreign countries:
 - a. Cambodian National Police in Phnom Penh and Siem Reap;

- b. International Law Enforcement Academy (ILEA) in El Salvador;
 - c. Moroccan Police Academy in Kenitra;
 - d. Ontario Canada Provincial Police in Niagara Falls, Canada; and
 - e. Royal Canadian Mounted Police in Ottawa, Canada.
4. The statements in this affidavit are based on personal observations, training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a complaint and an arrest warrant, this affiant has not included each and every fact known to me concerning this investigation. This affiant has set forth the facts believed necessary to establish probable cause to believe that BILL LAWRENCE, JR., has violated Title 18, United States Code, Sections 2252(a)(2) and (b)(1), that is receipt and distribution of child pornography.

STATUTORY AUTHORITY

5. 18 U.S.C. § 2252 prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, or possessing any visual depiction of minors engaging in sexually explicit conduct when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce.

DEFINITIONS

6. The following definitions apply to this Affidavit:
- a. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person

under the age of eighteen years.

- b. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.
- c. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.
- d. The term “computer,” as defined in 18 U.S.C. §1030(e)(1), means an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.

PROBABLE CAUSE

- 7. On Monday, August 21, 2017, Southwest Missouri Cyber Crimes Task Force (SMCCTF) Task Force Officer (TFO) Brian Martin received CyberTips 23386975 and 23250318 from the National Center for Missing and Exploited Children (NCMEC). The CyberTips were initiated by Google, Inc. on August 11, 2017, at 17:04:50 GMT. According to the

Cybertips, Google reported that someone, using the email address “timberghost420@gmail.com,” had attached images of suspected child pornography to at least two emails. The emails were sent on August 10 and 16, 2017, from Internet Protocol (IP) address of 173.218.35.93. The IP address belonged to Suddenlink Communications. Upon discovering the files, Google notified NCMEC as required by law. Google submitted the images with the Cybertip.

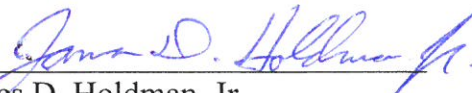
8. Google Inc. is an American multinational corporation that is best known for running one of the largest search engines on the World Wide Web. Every day, 200 million people use it. Google's main office is in Mountain View, California, USA. With Google Search, people can also search for pictures, Usenet newsgroups, news, and things to buy online. A Google Account is a user account that provides access to Google services such as Blogger, YouTube, and Google Groups. A Google Account is required for the use of Gmail. After a Google Account is created, users may enable other Google applications.
9. TFO Martin reviewed the images sent with the Cybertip. The images depict prepubescent children being sexually abused or in sexual poses.
10. TFO Martin performed an Internet search on the email address “timberghost420@gmail.com,” and for the phone number associated with the email account, (417) 593-9874. TFO Martin located a Facebook page in the name “Bill Lawrence.” The account is located at “<https://www.facebook.com/bill.lawrence.3367>.” Further Internet searches located a registered sex offender in Taney County with the same name. BILL LAWRENCE, JR., has a prior conviction for possessing child pornography and promoting child pornography in the first degree. LAWRENCE lists his home

address as 766 Aaron Way, Branson, in Taney County, Missouri.


11. On Monday, November 27, 2017, Suddenlink responded to an Investigative Subpoena identifying the subscriber as Mary Vernon, 766 Aaron Way, Branson, Missouri. This is the same address as that provided by LAWRENCE on his sexual offender registration page.
12. On January 4, 2018, the Honorable David P. Rush authorized a warrant to search 766 Aaron Way, Branson, Missouri. *In the Matter of the Search of 766 Aaron Way, Branson, Missouri 65616*, Case Number 18-SW-2001DPR.
13. On January 9, 2018, I, along with other investigators, executed the search warrant upon 766 Aaron Way, Branson, Missouri. Upon arrival, I made contact with LAWRENCE. LAWRENCE was apprised of the purpose of our investigation and agreed to speak with me.
14. After being advised of his *Miranda* rights, LAWRENCE confessed that he had both received and distributed child pornography using the “Chat Hour” application via the Internet. LAWRENCE also acknowledged using the “timberghost” e-mail address to transmit child pornography.
15. A forensic preview of LAWRENCE’s cellular telephone was conducted on scene. Multiple images depicting child pornography were stored on the telephone. One such image depicted a child, no more than 10 years of age, and appearing to be approximately five years old, laying on her back while an adult masturbated onto her face.

CONCLUSION

16. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against BILL LAWRENCE, for violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1), receipt and distribution of child pornography.


James D. Holdman, Jr.
Special Agent
Homeland Security Investigations

Subscribed and sworn before me this 9th day of January, 2018.


David P. Rush
United States Magistrate Judge
Western District of Missouri